

Brush, Jason

From: Brush, Jason
Sent: Wednesday, September 25, 2013 12:34 PM
To: Ryerson.Teddy; DIAMOND, JANE
Cc: Goldmann, Elizabeth; Leidy, Robert; Jessop, Carter; Bose, Laura; Campbell, Rich; Harris-Bishop, Rusty
Subject: Editorial today from Paul Green, Executive Director, Tucson Audubon (re: Rosemont mitigation)

FYI. Tucson Audubon is Pima's co-sponsor in the ILF program.



Paul Green, executive director, Tucson Audubon

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[Paul Green: Long-lasting effects of Rosemont on waterways must be considered carefully](#)

12 hours ago • By Paul Green Special to the Arizona Daily Star

In southeast Arizona, waterways and surrounding lands, including seeps and springs, have a special and unique significance in our regional landscape. They contribute to our safe drinking water, provide places for our solace and recreation, and are home to a wide diversity of animals and plants.

Because these "green ribbons of life" have such a high value, we make significant efforts to protect them. When development interests cause damage to these important areas, programs exist to compensate for the damage. Sometimes such compensation takes the form of restoring or enhancing sites nearby through initiatives, such as Pima County's Sonoran Desert Conservation Plan and the U.S. Army Corps of Engineers In-Lieu Fee Mitigation Program. Both provide incentives to avoid or minimize destruction of these already stressed habitats. When critical waterways are damaged, each of these programs require "mitigation" to compensate for the harm done.

The goal of habitat mitigation is to replace the functions and values of the habitats that the development will degrade. If a developer harms any of our increasingly rare riparian habitats, the federal program requires that it provide resources to a third party to restore or improve an area of degraded riparian habitat as close to the site of the damage as possible.

Sometimes the sheer scale of the damage to sensitive and important riparian areas is so huge that you have to scratch your head and ask, "Is it even possible to mitigate for this damage?"

The proposed Rosemont Copper mine is one such project. The open-pit proposal would stack up to 2.6 billion tons of mine waste containing acid-generating sulfides, heavy metals including arsenic, and other contaminants above the Davidson Canyon and Cienega Creek drainages. This watershed provides one-fifth of the groundwater recharged to the Tucson basin. One model predicts that the half-mile deep and one-mile wide open pit will drain water from beneath the Sonoita Plain, causing the depth to water to drop by between 600 and 900 feet below its current level.

We have no idea how to replace or restore the many destroyed springs and seeps that would result. They will be gone forever.

Davidson Canyon and Cienega Creek are designated Outstanding Arizona Waters. There are only 22 such sites in our state. This designation comes with a “no degradation” standard. Many of us, including the Arizona Department of Environmental Quality (ADEQ) in its recently filed comments, question whether the proposed Rosemont Copper mine project can meet this very strict standard.

The Arizona Game & Fish Department, the U.S. Environmental Protection Agency and the Bureau of Land Management, among others, have questioned if Rosemont’s mitigation plans are adequate.

We question if there is any mitigation that can come close to compensating our community for the anticipated permanent losses to our natural environment.

Ultimately the question for us all becomes: Will this foreign-owned mine, which will likely export the ore it extracts and profits that it makes, bring benefits to our community that outweigh the devastation to our natural environment?

We fear Rosemont’s proposal is in direct conflict with Tucson’s desire to become a self-sustaining economy, supporting clean air and water, supplying well-paying, technology-based jobs.

Rosemont would diminish our sense of place, our three-county \$350 million outdoor recreation and ecotourism industry, and our enjoyment of a healthy, high quality of life. Is this good for Tucson?

If state and federal agencies permit Rosemont’s proposal, they need to be very certain that the mitigation will fully offset the mine’s short-term and long-term negative impacts. Tucson will have to live with the consequences of their decision for countless generations after the mine is closed and its owners have moved on.